

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ETHICON WAVE 6 CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**DEFENDANTS' MOTION TO EXCLUDE CERTAIN
GENERAL OPINIONS OF DANIEL ELLIOTT, M.D.**

Defendants Ethicon, Inc. and Johnson & Johnson (hereinafter “Defendants” or “Ethicon”) move to exclude certain general opinions of one of Plaintiffs’ experts, Dr. Daniel Elliott, M.D., that are improper, irrelevant, unreliable, and/or are beyond his expertise. Ethicon hereby adopts and incorporates by reference all of the arguments that it presented as part of its briefing related to Dr. Elliott in the Wave 5 cases. *See* Doc. 4364 (Motion); 4367 (Memorandum in Support); and 4635 (Reply). Ethicon also requests that the Court preclude Dr. Elliott from providing general opinions about Prolift +M, because he has not disclosed any opinions about that device.

In support of this motion, Ethicon incorporates by reference its briefing and related exhibits seeking to exclude Dr. Elliott’s testimony in the Wave 5 cases, its supporting memorandum of law filed in conjunction herewith, and the following exhibits:

Exhibit	Description
Ex. A	Plaintiff List
Ex. B	Product identification labels

WHEREFORE, FOR THESE REASONS and as more fully set forth in Defendants' supporting memoranda of law, Defendants respectfully request that this Court enter an order granting Defendants' Motion to Exclude Certain General Opinions of Dr. Daniel Elliott, M.D.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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